

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF DELAWARE

BRIAN NEEFE, individually and	:	
As next of friend to LACEY KNUTSEN	:	
Plaintiffs,	:	
v.	:	C.A. No.: 04-366-KAJ
GARY LAYFIELD AND DELAWARE	:	JURY TRIAL OF SIX
STATE POLICE,	:	DEMANDED
Defendants.	:	

PLAINTIFF(S) REQUEST FOR PRODUCTION
DIRECTED TO DEFENDANT

NOW COME the Plaintiff(s) by and through counsel and request Defendant(s) to produce the following within thirty (30) days of the date of receipt of this request.

1. A copy of any and all pages of any insurance policy which provides or provided coverage to Defendant(s) pursuant to 21 Del. C. § 2118 et seq while Defendant(s) was operating the motor vehicle involved in the instant accident.
2. Copies of all photographs, sketches, diagrams or other drawings taken by or prepared by you or on your behalf or in your possession or available to you concerning any aspect of the litigation.
3. Copies of all statements or summaries of interviews taken of person with respect to any issue in the case including but not limited to the Plaintiff(s) of his/her attorney.
4. Copies of all reports of investigation, findings of facts, observation of facts or circumstances of any other matter relating to any aspect of the litigation.
5. Any reports by and person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.
6. Any other document or thing in your possession or available to you, in addition to the items specified in previous sections of this request for production which is or may be

relevant to any issue in the litigation including but not limited to issued of liability and/or damages.

7. Any and all medical records on Plaintiff(s) in Defendant(s) possession.
8. Any and all income information on Plaintiff(s) in Defendant(s) possession.
9. Any and all documents which Defendant(s) intends to introduce at trial.
10. Copy of entire claim file.
11. List each and every defense known to this defendant at this time that this defendant presently intends to assert.
12. Please provide copies of all documents and audio tapes that are in the possession, custody, and control of the defendant which are relevant to the disputed facts.

LAW OFFICE OF
EDWARD C. GILL, P.A.

DATED:7/20/05

/s/ Edward C. Gill
Edward C. Gill, Esquire
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on July 20, 2005, caused to be delivered by Electronic filing, a true and correct copy of PLAINTIFF(S) REQUEST FOR PRODUCTION DIRECTED TO DEFENDANT

W. Michael Tupman, Esquire
Department of Justice
102 West Water Street
Dover, Delaware 19904

LAW OFFICE OF
EDWARD C. GILL, P.A.

DATED: 7/20/05

/s/ Edward C. Gill
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